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Diamond Hook Ranch  
Lander Rt.  
Rawlins, WY 82070  
April 26, 1993

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JUL 30 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Private Radio Bureau LM & M DIVISION  
Attn: Refarming Commission THE RADIO BUREAU  
2025 M St. NW 5th Floor F.C.C.  
Washington, D. C. 20554

Gentlemen:

I offer The following comments concerning the proposed major changes to the land mobile service to increase the number of channels. Since, I do not have a copy of the proposal, I'm in the dark in certain areas and am depending on an article in the April 1993 Communication magazine. Based on limited information, I've outlined my comments below:

1. **Narrow Band Conversion Transmitter:**  
A simple screw driver adjustment would reduce the deviation. However, this may require sharing the deviation with a PL tone which will leave less room for voice. Transmitter frequency stability would have to be greatly improved to be able to operate on a narrow band environment.

2. **Narrow Band Conversion Receiver:**

Modification of the receiver would be much more difficult requiring the base band to be changed to provide protection

I suggest that certain areas and types of service be assigned clear channels with minimum restrictions to insure the best possible coverage of the licensee's permitted area.

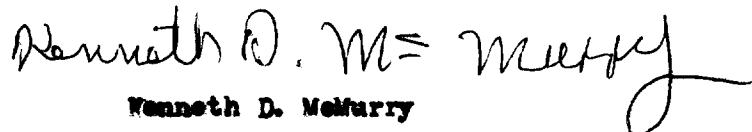
- B. My conclusion is that we could live with a change in operating frequency as long as it was in the VHF band. However, replacement of the total system and reduction of range may cause the system to be abandoned. This would require us to return to the old method of driving miles to coordinate activities. Several of the ranches have no telephones which would be a hardship, particularly in the winter, since they now depend on radio for emergency communication.

Wyoming has few VHF TV stations plus a number of translators operating in the high number channels. It is doubtful that many lower VHF channels will ever be used in this area. If several of these channels were available for mobiles, it would allow many additional radio channels if they are ever needed, which is doubtful. With the shift to cable and satellite systems, I predict a decline in the need for new TV stations, except low power systems in small towns. There is a vast spectrum here that is not now used and may never be used if restricted to UHF TV.

I do not believe it would be feasible to modify most existing equipment for 6.25 MHz spacing as the cost would exceed the present value of equipment. Parts required would also be a problem particularly in receiver front end selectivity improvement. If retro-fitting old equipment cannot be done, a costly total replacement would be required.

However, our main concern is the reduction of range. We have a very good radio system. It is an important tool for the efficient operation of a large ranch and provides a means of emergency communication. We do not believe that we should be asked to sacrifice our system to provide additional channels in Chicago or New York when the need is there and not in Wyoming.

Sincerely,



Kenneth D. McMurtry

Copies to Wyoming's  
Congressional Members